n.d., W.P.

ACS RD/RA KICKOFF MEETING

I. Liability of PRPs

A. Explain 4 Categories of liable parties
B. Explain Joint and Several Liability
- What the data base means, how it was prepared
- EPA check on the database accuracy
- Not set up for challenges to the database
C. How we received our evidence
-Information requests
-log books and accounts receivable of ACS
-Open records, you may send a foia request
-include site name
-authorization to bill you
-steering committee may have these records already
D. Individual parties
-Some were inappropriately named in special notice letter. Contact us via phone and letter. We will adjust special notice list (as opposed to making a determination of liability).

E. Deminimis
-Seeking a global settlement
-Will monitor negotiations if asked to by the large or small players. Will step in only if necessary.
-Nature of deminimis settlements varies greatly as to who is considered a deminimis party.
-Ability to pay issues may be considered

II. Structure of Consent Decree Negotiations

A. Time period: 120 days total
Day 1: April 23 (day of receipt)
Day 60: June 22 (good faith offer)
Day 120: August 21 (Sat. [mon. morning 8/23])

B. Participants
-U.S. EPA
-Department of Justice
-State of Indiana (do they want a speaking role?)
-Steering Committee (One cleanup, can't deal with 550 separate entities)

C. Day 60: Good faith offer
-Pages 3-4 of special notice letter
-Consistent with ROD
-We will meet prior to this to help shape the offer, if requested, and encourage early offer

The Scope of Work

-Wayde's discussion earlier. Must be consistent with the ROD.

The Model Consent Decree

-National model

-provides no better or worse a deal

-requested by PRP community/saves on attorney fees and endless negotiations

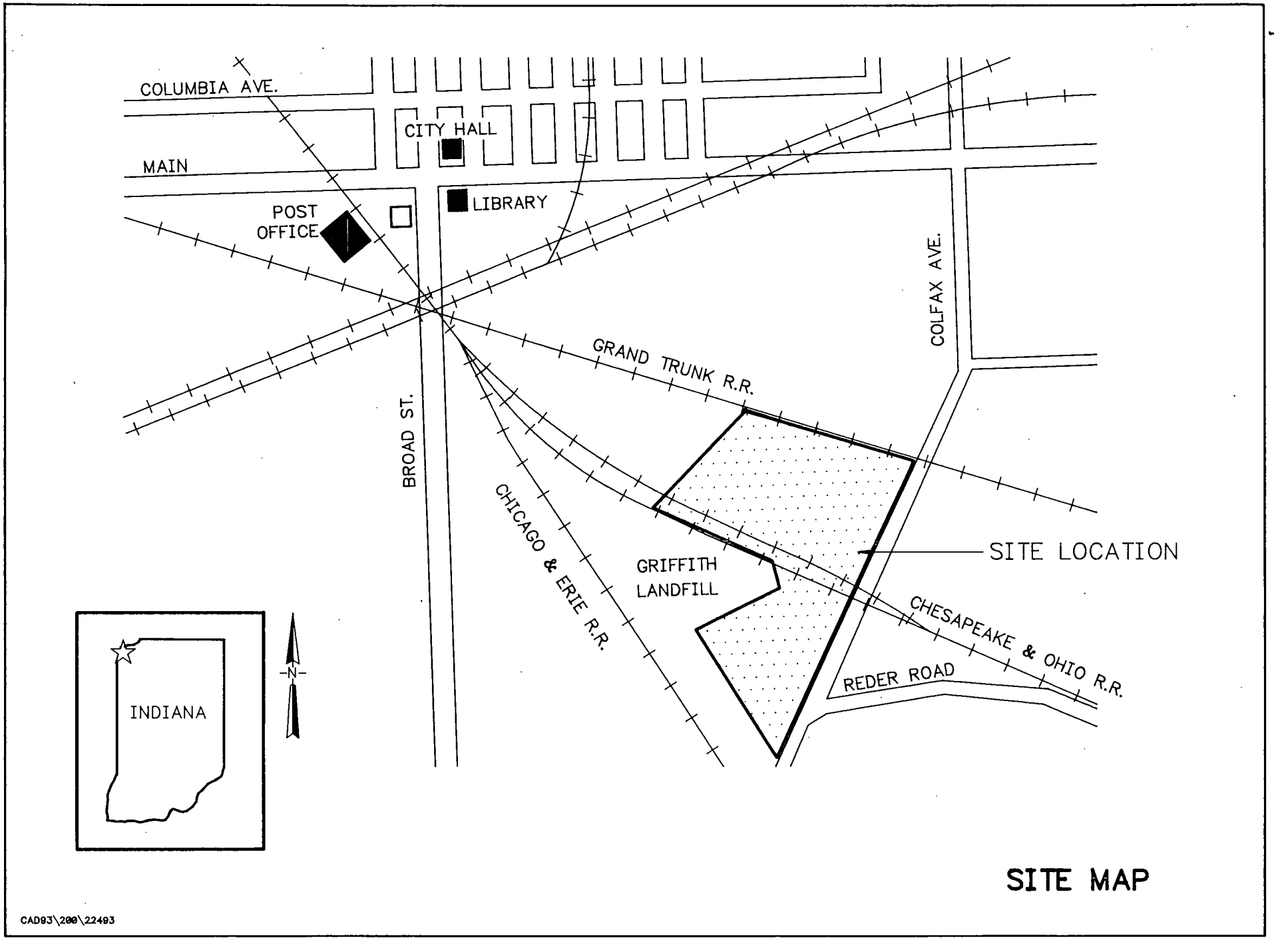
-concessions built in (contribution protection)

-To change the model, there must be both a site specific and a substantial reason to make the change.

-All changes must be identified in the good faith offer. We don't want progress in one area and backwards in another.

-Prioritize issues. 120 days goes quickly.

ACS SUPERFUND SITE
GRIFFITH, INDIANA



SITE MAP

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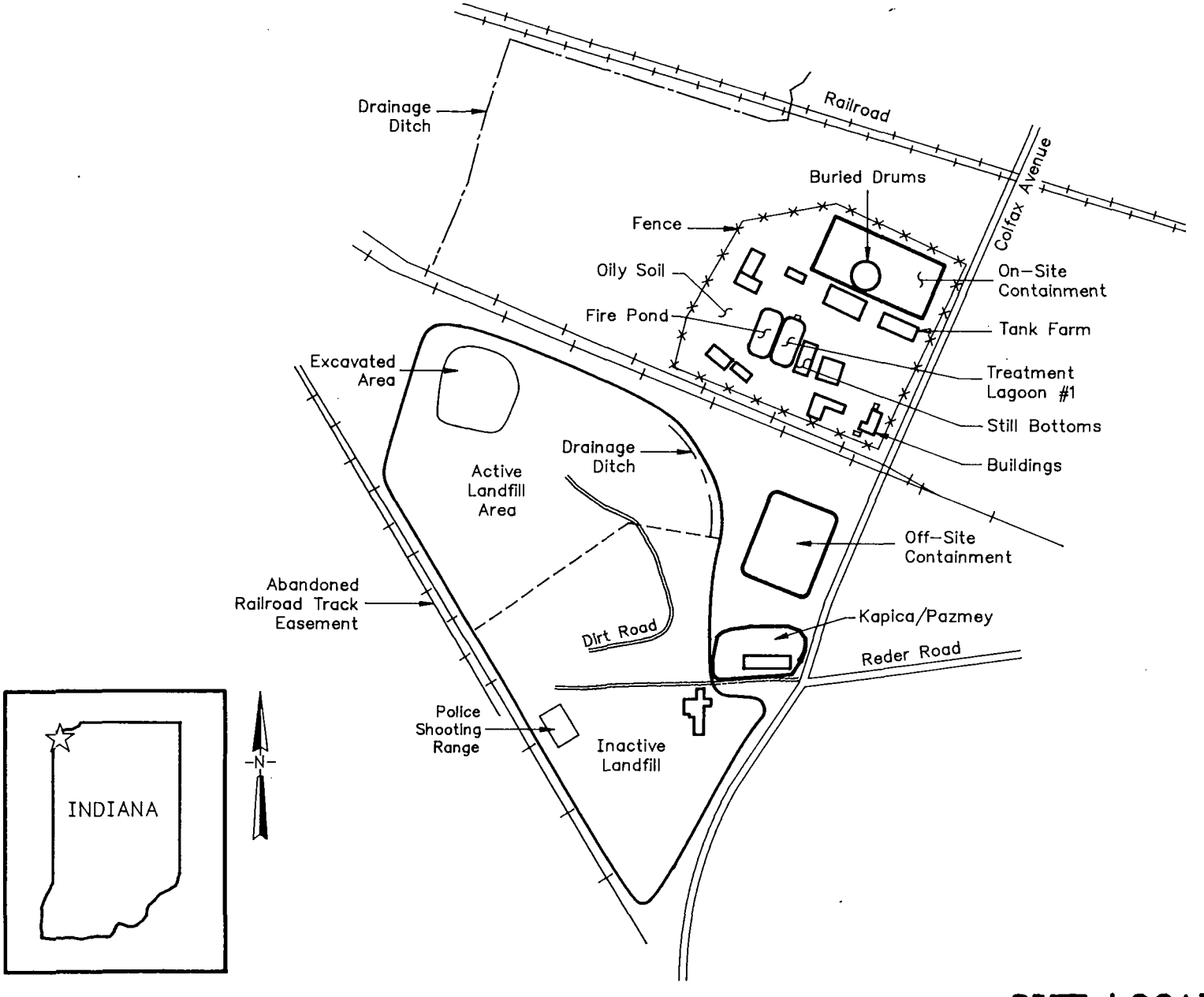
2



SITE LOCATION MAP

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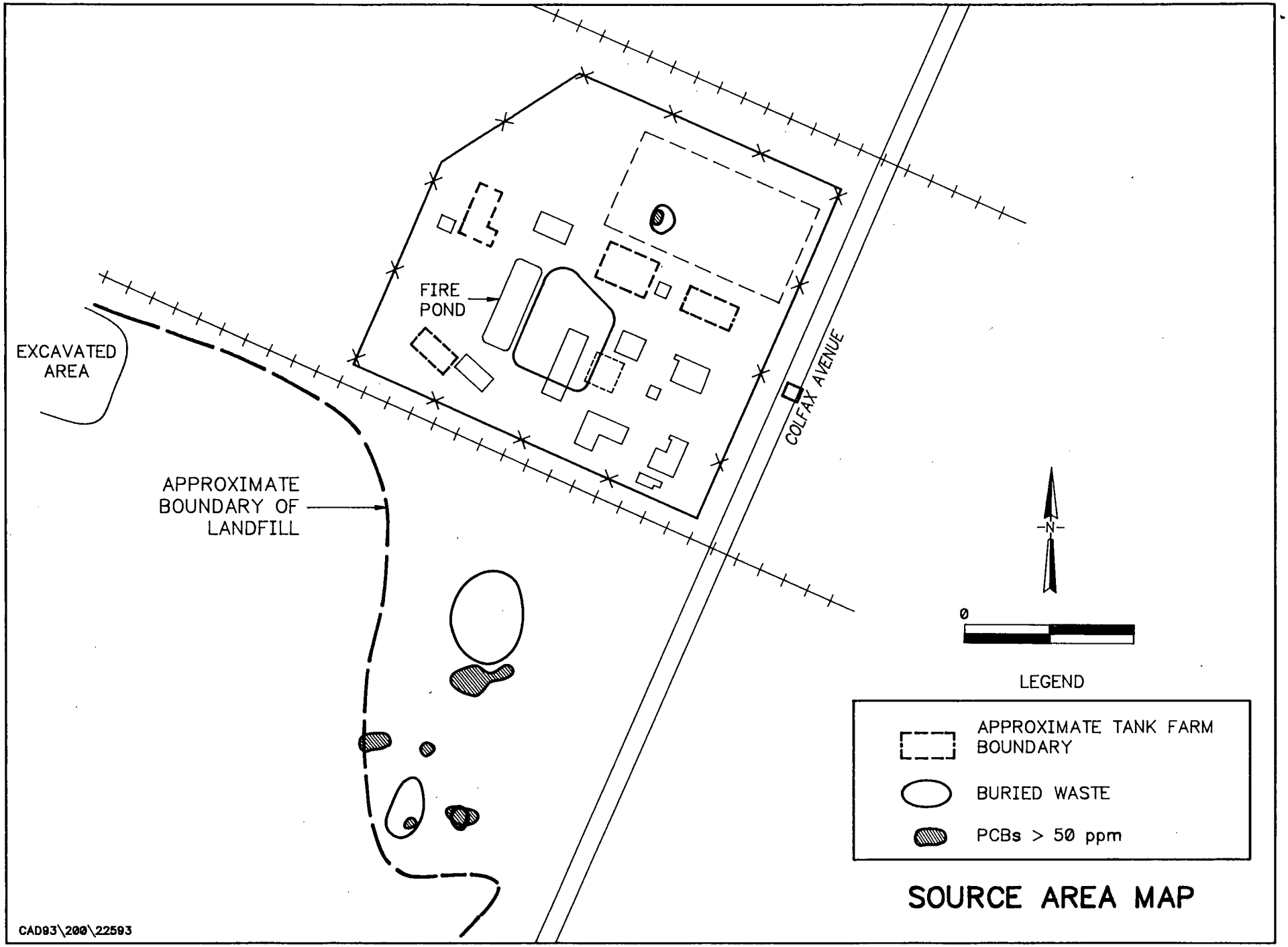
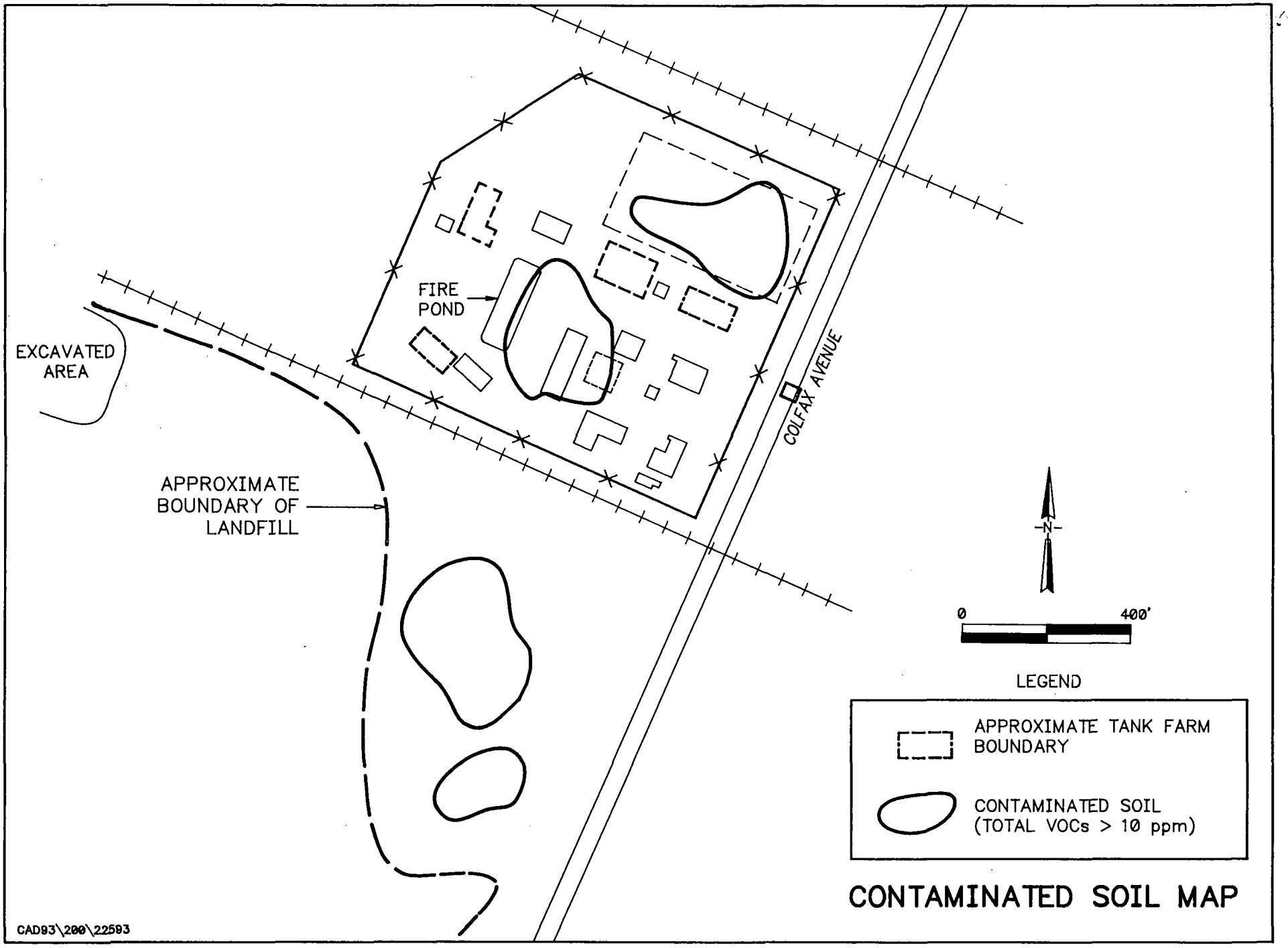
3


FIRE POND
EXCAVATED AREA
APPROXIMATE BOUNDARY OF LANDFILL
COLFAX AVENUE
N
0
LEGEND
APPROXIMATE TANK FARM BOUNDARY
BURIED WASTE
PCBs > 50 ppm
SOURCE AREA MAP
CAD93\200\22593


FIRE POND
EXCAVATED AREA
APPROXIMATE BOUNDARY OF LANDFILL
COLFAX AVENUE
N
0
400'
LEGEND
APPROXIMATE TANK FARM BOUNDARY
CONTAMINATED SOIL (TOTAL VOCs > 10 ppm)
CONTAMINATED SOIL MAP
CAD93\200\22593

SOURCE AREAS

ON-SITE CONTAINMENT AREA CONTAMINANTS

SLIDE 8

ON-SITE CONTAINMENT AREA
400 Buried Drums

3 CATEGORIES OF CONTAMINANTS EXIST. THESE ~~CONTAMINANTS~~ CATEGORIES PREVAIL ACROSS THE ENTIRE SITE.

(1) **Organic Contaminants Without PCBs --- 15,000 cubic yards**

(2) **Organic Contaminants With PCBs --- 980 cubic yards**

(3) **Metals - Contaminated Soils --- 100 cubic yards**

- THRU GEOPHYSICS AND A SUBSEQUENT TEST PIT IT WAS FOUND THAT ~~APPROX~~ A POCKET OF APPROX. 400 POSSIBLY INTACT DRUMS EXIST IN THE ONSITE CONTAINMENT AREA
- 3 CATEGORIES OF CONTAMINANTS EXIST IN THE OCA, AND ACROSS THE ENTIRE SITE THOSE BEING (1) ORGAN CONT. W/ PCBs (2) ORGAN CONT. W/O PCBs (3) SOILS CONT WITH METALS
- THE QUANTITIES ARE BASED ON RI RESULTS AND ROUGH APPROXIMATIONS OF CONTAMINATED MATERIAL (BOTH SOURCE AND SOIL) FOR RELATIVE COMPARISONS ONLY.

8

X

SLIDE 9

FOR THE

STILL BOTTOMS/TREATMENT LAGOON AND ADJACENT AREA CONTAMINANTS

SLIDE 10

STILL BOTTOMS/TREATMENT LAGOON
3,200 Buried Drums

Organic Contaminants Without PCBs --- 25,400 cubic yards

Organic Contaminants With PCBs --- 1,300 cubic yards
(Still Bottoms and Adjacent Areas Only)

Metals - Contaminated Soils --- 550 cubic yards

- APPROX 3200 SUPPOSEDLY CRUSHED DRUMS WERE DEPOSITED IN THE STILL BOTTOMS POND & TREATMENT LAGOON WITH ~~THEY~~ they were TAKEN OUT OF COMMISSION IN THE EARLY 70's.

8 10

SLIDE 11

OFF-SITE CONTAINMENT AREA CONTAMINANTS

SLIDE 12

OFF-SITE CONTAINMENT AREA
20,000 - 30,000 Buried Drums

Organic Contaminants Without PCBs --- 51,000 cubic yards

Organic Contaminants With PCBs --- 5,250 cubic yards

Metals - Contaminanted Soils --- 950 cubic yards

- IN THE OFF-SITE CONTAIAMENT AREA 20-30,000 BURIED DRUMS ARE THOUGHT TO EXIST. ALSO, A TANKER CONTAINING PAINT SLUDGES
- THE BULK OF THE CONTAMINATION APPEARS TO EXIST IN THIS AREA.
- YOU CAN SEE THE RELATIVE PROPORTIONS OF THE CONTAMINANT CATEGORIES. ~~BASICALLY~~ SITEWIDE, EASILY 90% OF THE CONTAMINATION WOULD ~~FIT IN THE~~ BE ORGANIC W/O PCBS OR METALS

13

SLIDE 13

KAPICA/PAZMEY AREA CONTAMINANTS

SLIDE 14

KAPICA/PAZMEY AREA

Organic Contaminants Without PCBs --- 7,200 cubic yards

Organic Contaminants With PCBs --- 2,300 cubic yards

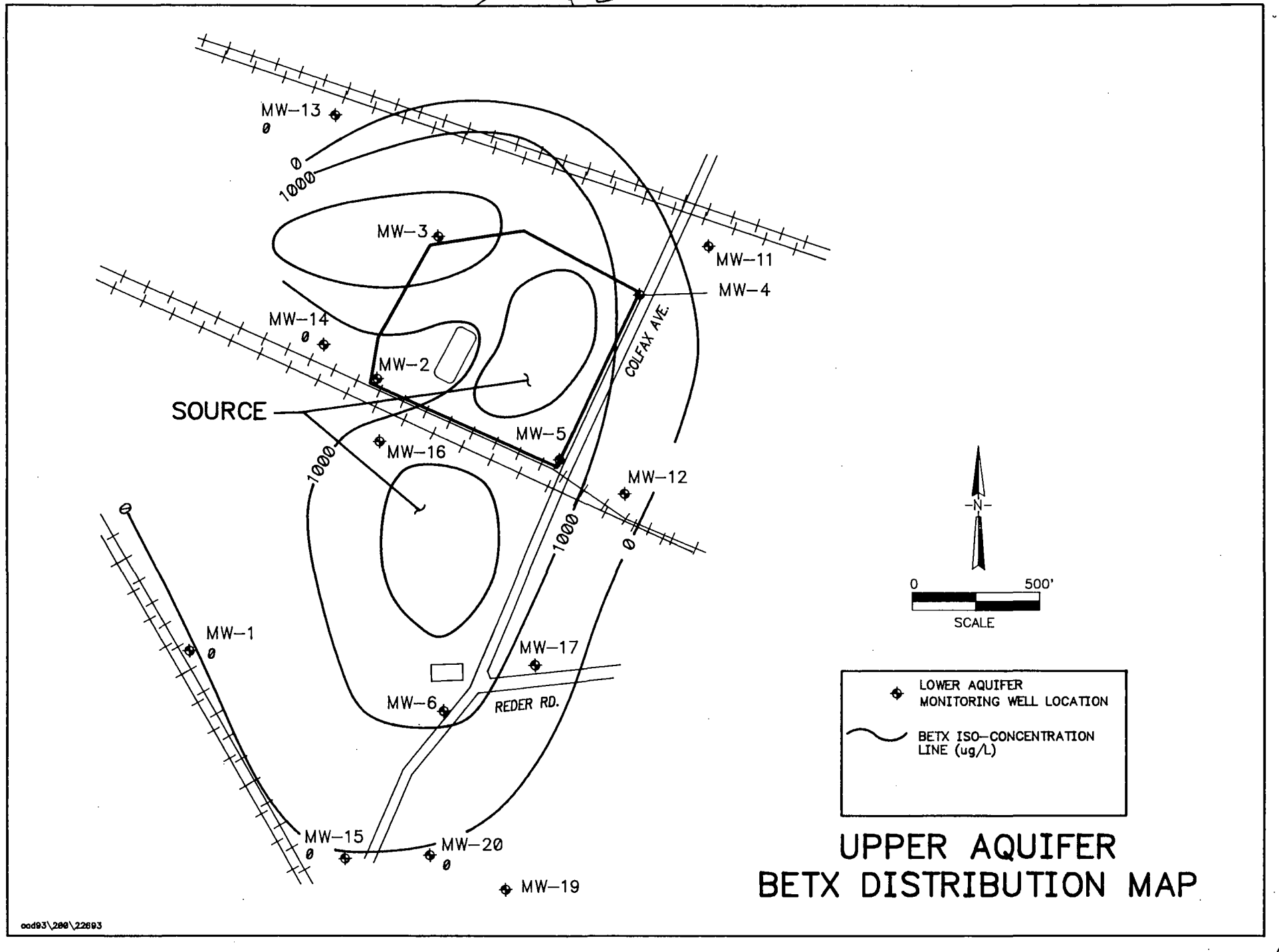
Metals - Contaminated Soils --- 900 cubic yards

~~IN THE KAPICA AREA~~

- THIS AREA WAS OPERATED AS A DRUM RECONDITIONING BUSINESS.
- ~~EVIDENTLY~~ KAPICA WOULD DUMP DRUM CONTENTS ON THE GROUND AS PART OF THEIR PROCESS.

~~THE CONTAMINATION HERE~~

SLIDE 15



UPPER AQUIFER
BETX DISTRIBUTION MAP

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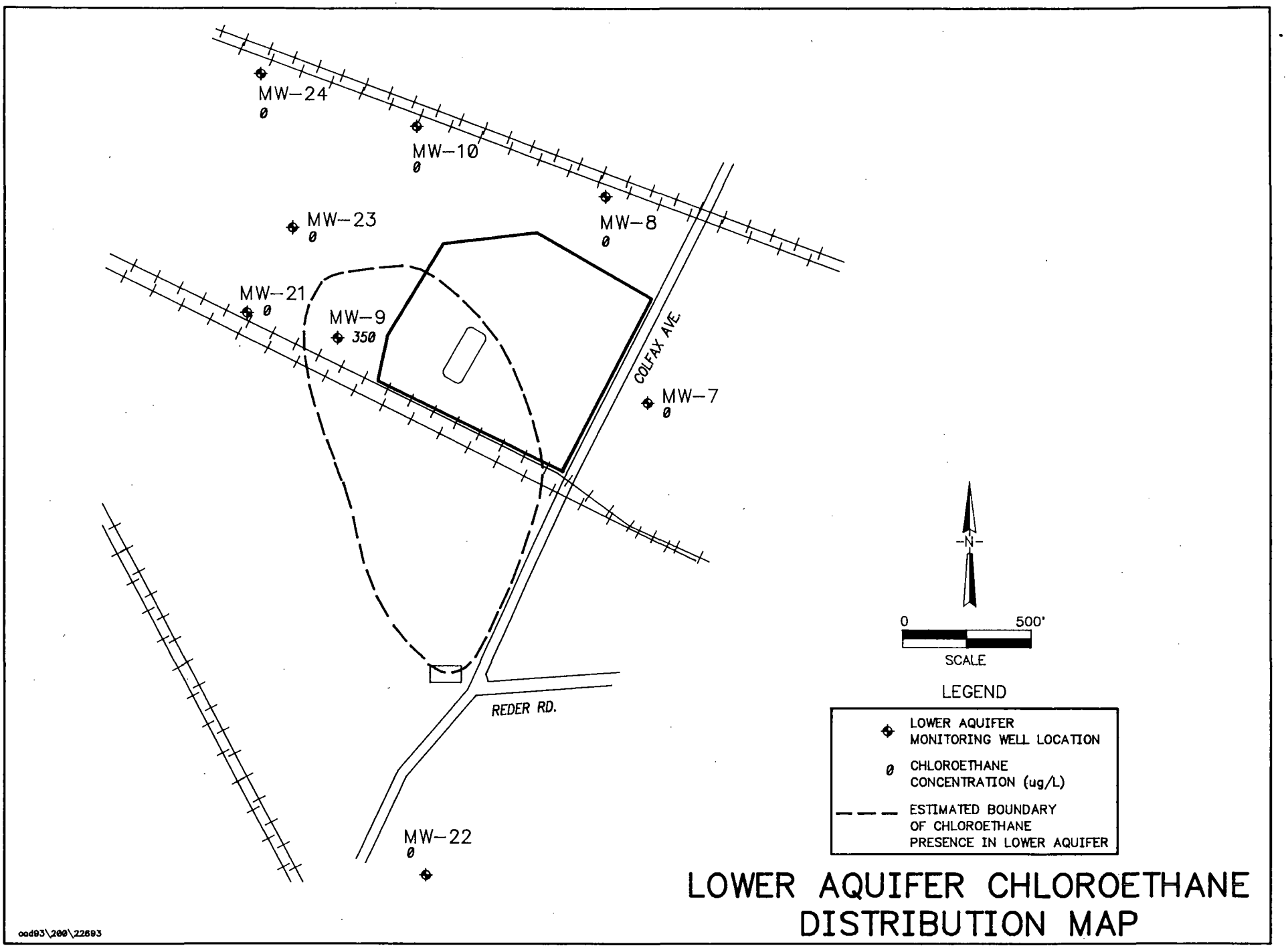

LOWER AQUIFER CHLOROETHANE DISTRIBUTION MAP

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SLIDE 17

UPPER AQUIFER GROUNDWATER CONTAMINANTS

Volatiles

Chloromethane

Vinyl Chloride

Methylene Chloride

Acetone

1,1-Dichloroethane

1,1-(cis)Dichloroethene

2-Butanone

Trichloroethene

Benzene

4-Methyl-2-pentanone

Tetrachloroethene

Ethylbenzene

Semivolatiles

Bis(2-chloroethyl)ether *

1,4-Dichlorobenzene

4-Methylphenol

Isophorone

Pentachlorophenol

Bis(2-ethylhexyl)phthalate

Pesticides/PCBs

Total PCBs

* Also lower aquifer contaminant

SLIDE 18

UPPER AQUIFER GROUNDWATER CONTAMINANTS (Continued)

Inorganics

Arsenic *
Beryllium
Manganese
Thallium

TIC Groups

Cyclic Ketones
Dimethyl Ethyl Benzenes
Branched Alkanes
Non - Cyclic Acids

*Also lower aquifer contaminant

SLIDE 19

REMEDIAL ACTION GOALS

- PROTECT PUBLIC HEALTH AND THE ENVIRONMENT
- RESTORE GROUNDWATER TO APPLICABLE STATE AND FEDERAL STANDARDS
- SOURCE TREATMENT TO ELIMINATE THE OFF-SITE MIGRATION OF CONTAMINANTS

SLIDE 20

RECORD OF DECISION

SLIDE 21

MAJOR COMPONENTS OF SELECTED REMEDY

SLIDE 22

- Groundwater Pump and Treat -- Site Dewatering

- Discharge groundwater to surface water and wetlands

SLIDE 23

- Excavate 400 drums from the on-site Containment Area for offsite incineration

- Excavation of buried waste materials and treatment by low-temperature thermal treatment (LTTT)

- On-site treatment or off-site disposal of treatment condensate

- Vapor emission control during excavation and possible immobilization of inorganic contaminants after LTTT

- Off-site disposal of miscellaneous debris

- In-situ vapor extraction pilot study of buried waste in On-site Area

- In-situ vapor extraction of contaminated soils

SLIDE 26

- Continued evaluation and monitoring of wetlands and, if necessary, remediation

- Long-term groundwater monitoring

- Fencing the site and possible implementation of deed and access restrictions and deed notices

- Private well sampling with possible well closures or ground water use advisories

28

CLEANUP STANDARDS

GROUNDWATER

- CUMULATIVE CANCER RISK NOT TO EXCEED 1.3×10^{-5}

- CUMULATIVE HAZARD INDEX < 1.0

SOIL

- CUMULATIVE CANCER RISK NOT TO EXCEED 3.3×10^{-5}

- CUMULATIVE HAZARD INDEX < 1.0

- PCB -- 10 ppm with 10 " soil cover

- LEAD -- 500 ppm

PROPOSED PLAN (THERMAL OFFSITE/ISVE ONSITE) COST ESTIMATE

Direct Capital Costs

Item	Cost
Surface Water Diversion	$200,000
Site Preparation	$525,000
Groundwater Extraction System	$500,000
Groundwater Treatment System	$1,200,000
Remove ACS Tank Farms	$150,000
Excavation of Drums	$50,000
Repackaging and Offsite Incineration of Drums	$350,000
Off-site Disposal of Drum and Miscellaneous Debris	$1,000,000
Off-site Disposal of PCB Soil Residue at RCRA/TSCA Landfill	$700,000
Treatability/Pilot Study	$200,000
Portable Building	$168,000
Onsite Low Temp Thermal Trtmt	**$5,400,000**
Surface Restoration or Capping	$525,000
Off-site Disposal of Metals	$625,000
Vapor Extraction Pilot Study	$400,000
Vapor Extraction	$800,000
Wetland Assessment	TBD
DIRECT CAPITAL SUBTOTAL EXCLUDING LTTT	**$7,383,000 + TBD**
DIRECT CAPITAL SUBTOTAL FOR LTTT	**$5,400,000**
OVERALL DIRECT CAPITAL SUBTOTAL	**$12,790,000 + TBD**

PROPOSED PLAN (THERMAL OFF SITE/ISVE ON SITE) COST ESTIMATE

Indirect Capital Costs

Item	Cost
Health & Safety	$1,479,000
Design Level Investigation	$1,479,000
Engineering Design	$739,000
Startup Costs	$739,000
License/Permit Fees/Overnight	$739,000
Scope Contingency	$1,479,000
	$1,846,000
TOTAL INDIRECT CAPITAL COSTS	**$8,500,000**

PROPOSED PLAN (THERMAL OFF SITE/ISVE ON SITE) COST ESTIMATE

O & M Costs Item	Present-Worth Cost
Groundwater Monitoring	$3,074,000
Groundwater Extraction Wells	$999,000
Initial Groundwater Treatment	$1,269,000
Intermediate Groundwater Treatment	$2,077,000
Final Groundwater Treatment	$3,843,000
Excavation Vapor Treatment	$919,000
Vapor Extraction	$2,315,000
Insurance	$51,000
Reserve Fund	$51,000
Administration	$3,074,000
TOTAL PRESENT WORTH OF O&M	**$17,670,000**
DIRECT CAPITAL COST	**$12,790,000**
INDIRECT CAPITAL COST	**$8,500,000**
TOTAL NET PRESENT WORTH	**$39,000,000**

SITE-WIDE

- OFF-SITE INCINERATION OF INTACT BURIED DRUMS

- OFF-SITE DISPOSAL OF MISCELLANEOUS DEBRIS

- IN-SITU VAPOR EXTRACTION ~~PILOT STUDY~~ FOR CONTAMINATED SOILS

ON-SITE AREA

- IN-SITU VAPOR EXTRACTION OF CONTAMINATED SOILS

- IN-SITU VAPOR EXTRACTION PILOT PROJECT FOR SELECTED BURIED WASTES

OFF-SITE AREA

- IN-SITU VAPOR EXTRACTION OF CONTAMINATED SOILS

- ON-SITE LOW TEMPERATURE THERMAL TREATMENT OF BURIED WASTES (with vapor emission control during excavation)

- TREATMENT RESIDUALS REQUIRED TO MEET HEALTH-BASED LEVELS PRIOR TO REDEPOSITING BACK INTO EXCAVATIONS

GROUNDWATER

- GROUNDWATER PUMPING AND TREATMENT

- TREATED WATER CONTROLLED DISCHARGE TO WETLANDS

- CONTINUED EVALUATION AND MONITORING OF WETLANDS, AND, IF NECESSARY, REMEDIATION, WHICH MAY REQUIRE REPLACEMENT OF WETLANDS

SLIDE 1 - SITE NAME
GOOD MORNING

WELCOME to the RD/RA negotiation kickoff meeting for ACS site located in Griffith Indiana.

My name is Wayde Hartwick, I am with the USEPA and I am the Remedial Project Manager for this site.

With me here today are:

Steve Siegel - USEPA's ORC
Steve Mason - " "

Gabriele Hauer - project manager from IDEM
and Myra Spicker - Indiana Office of the Attorney General

The purpose of today's meeting is

- to introduce you to the negotiating party's from USEPA and the State of Indiana;
- to provide general information on the site and the negotiation process to PRPs who have had little or no involvement with remedial activities at this site; and
- to bring parties together to hopefully interact with the Steering committee that has already formed; to join the committee, and continue negotiations to settlement.

I'll give you a short presentation on:

-site background
-results of the RI/FS
-requirements set forth in the ROD; and
-the implementation of those requirements as defined in the draft SOW that is attached to the Draft CD.

I'll then ask Mr. Siegel and Mr. Mason to provide you specifics on

-PRP liability under CERCLA; and
-the Structure of Consent Decree negotiations

After Mr. Siegel's and Mr. Mason's presentations, A question and answer period will follow. At the end of Questions and answers representatives from USEPA and the State will leave, giving you the room for the rest of the day to discuss the site and the negotiation process.

NEXT SLIDE

SLIDE 2- site map

ACS is located on Colfax Avenue, southeast of the city of Griffith Indiana.

ACS is currently an operating chemical manufacturer and reclaimed or recovered solvents from 1955 to 1990.

Single family residences exist in close proximity to the site; along Broad street and along Reder Road.

ACS was placed on the NPL in September 1984

A consent order was signed in 1988 with approx 125 parties to perform the RI/FS

The RI/FS was completed in the Spring of 1992.

A ROD for remedial action was signed in September 1992 and the State of Indiana concurred.

NOW All of you recently received Special notice letters informing you of USEPA's intention to take Remedial Action at ACS and your liability for these actions under CERCLA. The pre-1975 and 75-80 categories are based on the disposal operations that took place at the site. Basically most of the disposal activities took place pre- 1975. 1975-80 liability is primarily based on drum reconditioning operations at the Kapica site, which I'll discuss in a few minutes.

NEXT SLIDE 3- site location map

The site itself is divided into the On-site Area {north of the central Chesapeake and Ohio RR} and the Off-site Area {south of the C&O RR}

The On-site Area houses the operating facility and buried waste areas (or Source Areas) which include----

- on-site containment area --where drums were stored over the years and at least 400 intact buried drums are believed to exist; and

- treatment lagoon/still bottoms pond and adjacent areas ---where sludges accumulated and crushed drums were buried when units were taken out of commission in the early 1970's.

The Off-site Area consists of---

- off-site containment area which includes 20-30,000 buried drums and an intact tank truck believed to contain approx 500 gallons of solidified paint; and
- the Kapica/Pazmey area - - which was a drum reconditioning business that up until 1980 dumped contents of drums it received from ACS onto the ground, causing contamination.

- Wetlands also exist on the western portion of the site for which additional sampling will need to be performed.
- The RI has indicated that the Griffith Municipal landfill, which was not originally part of the site, (although studied as part of the site during the RI) is not causing a problem.

NEXT SLIDE 4 - souce area map

The source areas were delineated based on RI sampling as indicated here. In the RI, Buried waste (or source areas) were defined as those areas with greater than 10,000ppm total VOCs.

NEXT SLIDE 5 - contaminated soil map

Contaminated soils were delineated based on RI sampling and are shown here as areas with greater than 10 ppm total VOCs. As expected, they are basically outgrowths of source areas.

NEXT SLIDE 6 - source areas

I'd like to now briefly go thru the type and relative quantity of contaminants found in the four main source areas and in the contaminated soils around the source areas.

SLIDE 7 - onsite containment area contaminants

For the on-site containment area

SLIDE 8 - onsite containment area contaminants

Thru geophysics and subsequent test pits, it was found that a pocket of approx 400 possibly intact drums exist in the On-site Containment area.

3 categories of contaminants exist in the Onsite containment Area, and across the entire site. those are:

-organic contaminants with PCBs
-organic contaminants without PCBs
-soils contaminanted with metals

The quantities shown here are based on RI results and are rough approximations of contaminated material for relative comparison purposes only.

SLIDE 9- still bottoms pond/treatment lagoon and adjacent areas.

For the still bottoms pond/treatment lagoon and adjacent areas.

SLIDE 10-still bottoms pond/treatment lagoon and adjacent areas.

Approx 3200 supposedly crushed drums were deposited in the still bottoms pond and treatment lagoon when they were taken out of service in the early 1970's.

Again, here is the relative distribution of the three site contaminant categories for this area.

SLIDE 11-offsite containment area contaminants

For the off-site containment area

SLIDE 12-offsite containment area contaminants

In the off-site containment area, 20-30,000 buried drums are thought to exist. Also, a tank truck containing paint sludges is buried in this area of the site.

The bulk of the contamination appears to exist in this area.

The relative proportions of the contaminant categories shown here basically represent the sitewide conditions. Easily 90 - 95%% of the site contamination would fall in the category of organic contamination without PCBs.

SLIDE 13-Kapica/Pazmeny area contaminants

For the Kapica Pazmey area

SLIDE 14-Kapica Pazmey area

The Kapica/Pazmey area was operated as a drum reconditioning business. Kapica would dump any residual contents of drums received from ACS onto the ground, causing contamination.

SLIDE 15 - upper aquifer dist. map

Two separate aquifers have been contaminated by site activities. The upper sand and gravel aquifer is about 15-20 feet thick and is heavily contaminated with BETX compounds. This map shows the distribution of the BETX compounds in the upper aquifer. as you can see, contamination has begun to migrate off-site.

The general groundwater flow in the upper aquifer is to the west, towards the wetlands. Ground water flow is currently influenced by dewatering activities at the Griffith Municipal Landfill.

Private wells in the upper aquifer are not used for drinking but are used for other household needs.

SLIDE 16 - lower aquifer contaminant map

At the base of the upper sand and gravel aquifer is a clay unit that separates it from the lower sand and gravel aquifer. This map shows that Contaminants have migrated through the clay unit and into the lower sand and gravel aquifer. The contamination in the lower aquifer covers a much smaller areal extent than contamination in the upper aquifer.

Flow in the lower aquifer is to the north and has not migrated off-site. Private drinking water wells do exist in the lower aquifer, a number of which were sampled during the RI. None showed evidence of ACS contamination.

SLIDES 17 and 18 - upper and lower aquifer contaminants.

The next two slides list out the groundwater contaminants found in the aquifers that were identified as producing unacceptable health risks.

swith to slide 18--All of these are upper aquifer contaminants. Bis(2-chloroethyl)ether and arsenic are also lower aquifer contaminants.

SLIDE 19 - remedial action goals

OK -- I've shown you briefly what the problem is at the site, now I'll show you what we plan on doing about it.

Remedial Action Goals were set during the RI/FS.
The goals are:

- -to protect Public Health and the Environment
- -To address groundwater contamination; and
- -to treat the source of contamination.

SLIDE 20 - rod

These goals were carried through to the Record of Decision, which was signed by the Regional Administrator on Sept 30, 1992.

SLIDE 21 - major remedy components

The major components of the site remedy outlined in the ROD and the Statement of Work for the RD/RA are as follows.

SLIDE 22 - groundwater P & T

Groundwater pumping and treatment will be initiated to dewater the upper aquifer and allow implementation of the selected treatment technologies. The exact technology or combination of technologies used to remediat the groundwater will be determined in design.

Treated water will be discharged to turkey creek or one of its tributaries and to the wetlands to prevent their dewatering through upper aquifer pumping.

SLIDE 23 -excavate drums, LTTT

The next component will be to excavate the drums in the ON-site containment area and send them offsite to a licensed hazardous waste incinerator.

Treatment of source areas will then begin using LTTT in the Off-site Area. When the cleanup standards identified in the Record of Decision are attained, treatment residuals will be redeposited.

Any treatment condensate associated with LTTT or SVE will be treated onsite or could be sent off-site for disposal.

SLIDE 24 -vapor emission ctrl

Because the vast majority of contaminants are volatile, vapor emission controls would most likely need to be implemented during excavation activities.

Soils contaminated with metals may have to be immobilized or sent off-site for disposal;

All miscellaneous debris uncovered (such as buried metallic objects, crushed drums, or even buried tankers) will have to be steam-cleaned and sent off-site for disposal.

SLIDE 25 -ISVE pilot study

As I mentioned previously, treatment of source areas in the Off-site Area (the area south of the Chesapeake and Ohio Railway) will be accomplished by LTTT. In the on-site area, the ROD allows for an optional Pilot study for ISVE to be accomplished on buried waste material. If this pilot study for ISVE is unsuccessful or is not initiated, then buried waste in the on-site area will be treated by LTTT.

The site-wide contaminated soils will be treated by ISVE. If it is determined that the cumulative cleanup standard cannot be met by ISVE then LTTT would be required in the nonattainment areas.

SLIDE 26 - eval of wetlands, long term monitoring

An ecological assessment for the site concluded that further evaluation was needed for the wetlands. This will be accomplished at the start of remedial design activities.

Long term ground water monitoring will also be required to verify compliance with cleanup standards.

SLIDE 27 - fencing, residential well sampling

The site will have to be isolated from the public during remedial activities. it is not completely isolated now.

Many of the private wells in the area will have to be resampled, or in some cases, sampled for the first time to determine if well closures or "USE" advisories need to be issued.

SLIDE 28 - cleanup standards

Cleanup standards for ground water and soils were presented to the public as proposed human health cleanup standards in June of 1992. These standards were essentially adopted in the September 1992 ROD.

SLIDE 29 - groundwater std

For this audience I will not go into the specifics of how cleanup standards are calculated. I will just say that standard risk calculations were utilized and that attainment of individual contaminants is not important. What is important is Attainment of the cumulative risk level for all groundwater contaminants. This risk level set for the ACS site and is within the USEPA acceptable cleanup risk range.

SLIDE 30 - soil

The same applies for soil. a cumulative maximum risk is established for the site. PCB and lead cleanup levels are also required for the site. PCB cleanup levels are based on CERCLA guidance and TSCA requirements. The Lead cleanup level is based on guidance from the Agency for Toxic Substance Disease Registrary, but may be refined in design. {Uptake Biokinetic Model-UBK}

SLIDE 31 - cost estimate - direct

This cost estimate was presented in the ROD but originally developed by the PRP contractor for the FS. USEPA added some line items to the estimate that addressed vapor emission control and wetland assessment. The Wetland assessment line item is a "to be determined", however, we do not believe it will significantly impact overall costs.

The bottom line is 12.7 million estimate for the the total direct costs.

SLIDE 32 - cost estimate - indirect

8.5 million in indirect costs has been estimated for such things as plans and contingencies.

SLIDE 33 - cost estimate - O&M

17.6 million in ground water treatment and vapor extraction O&M has been estimated.

This gives us a total cost estimate of 39 Million.
The total cost is really controlled by the amount of material that will need to be treated by LTTT. This estimate assumes only a portion of the buried waste will need to be treated by LTTT and that the ISVE pilot study is successful in the ON-site Area.

The ROD sets a cost range of 38 to 47 Million for the contingency of varying amounts of material needing LTTT. The ROD also goes on to say that if all contaminated soils would require LTTT then the cost could approach the estimate for alternative 7b in the feasibility study, which is 64.4 million.

SLIDE 34 - site wide summary

In summary, the remedy established in the ROD and to be implemented in the RD/RA SOW will include the following:

- -offsite incineration of intact drums
- -offsite disposal of miscellaneous debris
- -and ISVE for contaminated soils.

THE WORDS "PILOT STUDY" IN THAT LAST BULLET ARE TYPOS. SO IT SHOULD READ "INSITU VAPOR EXTRACTION FOR CONTAMINATED SOILS".

SLIDE 35 - on-site area summary

For the onsite area - we'll do ISVE for contaminated soils and the OPTIONAL ISVE pilot project for selected buried wastes. If the pilot study is not initiated, fails, or is abandoned then LTTT will be utilized for the on-site area buried wastes.

SLIDE 36 - offsite area summary

for the offsite area - ISVE will be performed for contaminated soils.

LTTT will be performed for buried waste material.

All excavated soils treated can be redeposited onsite after cleanup standards are met.

SLIDE 37 -groundwater

for the groundwater:

- -We'll pump and treat
- -the treated water will be discharged to wetlands and surface water
- -continued evaluation and monitoring of wetlands will also be required

AFTER LAST SLIDE

The provisions I have outlined for the remedy are carried forward to the draft SOW for RD/RA. Some of the remedy components like site fencing, wetland evaluation, and private well sampling will be accomplished in a pre-design task soon after the consent decree is lodged.

These documents are the subject of negotiation for the next 60 days but their final versions must be consistent with the ROD.

Treatability studies conducted by the prps have just recently been submitted and are currently under review by USEPA.

Steve siegel will now discuss liability issues under CERCLA and the structure of consent decree negotiations.

Steve----